

Louisiana Underground Storage Tank Worker Certification Program (Effective Date – April 21, 1993)

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The following is to be used as guidance in clarifying the intent of the underground storage tank worker certification regulations. As questions arise, the Louisiana Department of Environmental Quality (LDEQ) will address them in this document.

Use of Subcontractor to Perform UST Work

The LDEQ has no objection to a primary contractor hiring a subcontractor who employs a certified UST worker to perform UST work, provided the certified UST worker is present during the critical junctures and has complete control over the UST work being performed. The certified UST worker should be aware that his/her certificate may be revoked in the event of a violation of the regulations.

1. Installation/Repair/Closure

- A. Installation: The following UST activities require the presence and supervision of an UST worker certified in installation:
 - a. the preparation of the excavation immediately prior to receiving backfill and the tank;
 - b. the setting of the tank and the piping, including placement of any anchoring devices, backfilling to the level of the tank, and strapping (if any);
 - c. any time during the installation in which piping components are connected which includes but is not limited to product piping, risers, vent piping, or the connection of the underground piping to the bottom of the shear valve in a pressure system or to the bottom of the check valve in a suction system or connection of the underground piping to the first above ground component;
 - d. all pressure testing of the UST system (including associated piping) performed during the installation;
 - e. completion of the backfill and filling of the excavation; and
 - f. installation of external release detection devices associated with groundwater and vapor monitoring within the excavation zone.
- B. Repair: The following UST activities require the presence and supervision of an UST worker certified in repair:
 - a. the completion of the excavation of existing tanks and/or piping;

- b. the actual performance of the repairs to the tank and/or piping;
- c. any time during the repair process when components of the piping are connected. However, if the repair involves the connection of an above ground component with an underground component and the connection itself will be underground, the repair needs to be supervised by a certified worker. On the other hand, if the connection will remain above ground and is easily visible, the repair does not need the supervision of a certified worker.
- d. any time during the repair process when the tank and/or the associated piping are tested;
- e. any time during the modification process when equipment is connected to the tank and/or piping e.g. upgrading to install an Automatic Tank Gauge or a ball float on the UST system; The same thought process applies here as in c above. Depending on the location of the connection itself, will determine if a certified worker needs to be present.
- f. removal and excavation of paving and backfill as required to expose the top of a tank prior to lining the interior;
- g. cutting a sufficiently sized access opening in the tank to allow entry by interior lining personnel;
- h. inspection and precision testing as required to ascertain the adequacy and integrity of the completed interior lining; and
- i. re-installation of the access opening or construction of a permanent man-way, including repair, inspection, and testing.

C. Closure: The following UST activities require the presence and supervision of an UST worker certified in closure:

- a. During the process of cleaning a tank;
- b. During the process of purging a tank;
- c. During the process of inerting a tank; and
- d. During the collection of subsurface samples taken to determine if a release has occurred.

2. The following UST activities are those for which the presence and/or supervision of a certified worker are not required:

A. Installation

- a. Installation of UST systems, which are excluded from the Louisiana Underground Storage Tank Rules and Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks);
- b. Installation of deferred UST systems, with the exception of USTs that store fuel for use by emergency power generators. Work

- performed on emergency power generator USTs require supervision by a certified worker as they are subject to all provisions of the regulations, except release detection;
- c. Installation of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground piping, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; aboveground suction pumps;
 - d. Installation of any **non**-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences;
 - e. Installation, maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components;
 - f. Installation of a liner that is not part of a repair or upgrade;
 - g. Dry fitting of piping which includes product, or vent piping;

B. Repair

- a. Inspection and assessment of the interior of the tank to determine whether the interior lining is appropriate or feasible;
- b. Application of appropriate lining materials (e.g., epoxy resins) to all or parts of the interior portion of the tank, including application of such materials for the repair or refurbishing of a fiberglass reinforced plastic (FRP) tank;
- c. Repair or replacement of underground storage tank submersible pumps (including motors, internal electrical components and pumping apparatus) unless piping is disconnected;
- d. Repair of UST systems, which are excluded from the Louisiana Underground Storage Tank Rules and Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks);
- e. Repair of deferred UST systems, with the exception of USTs that store fuel for use by emergency power generators. Work performed on emergency power generator USTs require supervision by a certified worker as they are subject to all provisions of the regulations, except release detection;
- f. Repair of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground piping, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; aboveground suction pumps;

- g. Repair of any **non**-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences;
- h. Repair, maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components;

C. Closure

- a. Activities related to the transportation, disposal and storage of used UST system components, (including tanks, piping and ancillary UST equipment) which occur after such components have been removed from the site at which they had previously been in service;
- b. Closure of UST systems, which are excluded from the Louisiana Underground Storage Tank Rules and Regulations (e.g., aboveground tanks, UST systems whose capacity is 110 gallons or less, flow-through process tanks);
- c. Closure of deferred UST systems, with the exception of USTs that store fuel for use by emergency power generators. Work performed on emergency power generator USTs require supervision by a certified worker as they are subject to all provisions of the regulations, except release detection;
- d. Closure of any component of an UST system which is located above the ground level, including aboveground tanks; aboveground piping, valves, fittings, and connectors; aboveground dispensers; aboveground vent lines; aboveground metering systems; aboveground suction pumps;
- e. Removal of any **non**-UST improvements: structures, fixtures or appurtenances at a UST facility, such as concrete and asphalt paving; electrical wiring conduit and controls; site utilities; storm sewer and drainage improvements; buildings; dispenser islands; awning or canopies; signs; landscaping; septic tanks; and fences;
- f. Maintenance or inspection of cathodic protection systems, including sacrificial anodes, impressed current systems (including rectifiers and non-sacrificial anodes), test stations and all appurtenant components;
- g. Other Activities Not Considered Critical Junctions: activities associated with the assessment, remediation or corrective action required to address releases from UST systems as long as activities don't include repair or modification of the system;
- h. Collection of groundwater/vapor samples from release detection devices;
- i. Construction of UST monitoring wells (excluding release detection devices), borings or piezometers when constructed as part of the

assessment or remediation of sites contaminated from leaking UST systems;

- j. Activities associated with the performance of a tank tightness test or a piping tightness test when conducted in accordance LAC 33:XI.701 and when the test equipment is NOT installed as a permanent component of the UST system including:
 - 1. Removal and excavation of paving and backfill as required to expose the appropriate UST system components for tightness testing purposes;
 - 2. The temporary installation or connection (and eventual removal or disconnection) of any equipment required only for and during the process of conducting the tightness test;
 - 3. The disconnection and reconnection of piping, valves, fittings and other UST system components when required for the purpose of conducting the tightness test; and,
 - 4. Reinstallation of backfill and paving after completion of the tightness test.